

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARGARET RHEE KARN

Plaintiff,

v.

SUSAN CHANA LASK,

Defendant

CIVIL ACTION NO: 15-CV-9946 (RWL)

NOTICE OF MOTION FOR RECONSIDERATION
AND STRIKE INFLAMMATORY FINDINGS

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, dated August 4, 2025, and all prior proceedings, submissions, and matters of record, Defendant Susan Chana Lask will move this Court, before Magistrate Judge Robert Lehrburger, United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order pursuant to:

- Local Civil Rule 6.3,
- Federal Rule of Civil Procedure 59(e), and
- Federal Rule of Civil Procedure 60(b)(1)

granting reconsideration of the Court's July 17, 2025 Order, and specifically:

- Striking inflammatory and unsupported findings;
- Correcting the misstatement that Defendant filed "two motions" for recusal;
- and for such other and further relief

This motion is based on clear error, manifest injustice, and matters of law and fact demonstrating that the Court's findings are unsupported and legally impermissible under Second Circuit precedent of *Keach v. County of Schenectady* and exemplified in *SerVaas Inc. v. Mills*.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.3, any opposing memoranda shall be served within fourteen (14) days after service of this motion, and any reply memoranda shall be served within seven (7) days thereafter.

Dated: August 4, 2025

LAW OFFICES OF SUSAN CHANA LASK

/s/ Susan Chana Lask
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